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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ROSE MARIE GARCIA,)	Case No. 1:21-cv-00317-EPG
)	
Plaintiff,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
vs.)	(ECF No. 14)
)	
KILOLO KIJAKAZI, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from May 31, 2022 to August 1, 2022, for Plaintiff to serve on defendant with Plaintiff's Opening Brief. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Good cause exists for this extension. First, Counsel for the Plaintiff underwent major orthopedic surgery on March 17, 2022, and is dealing with post-operation pain and the secondary effects of medications; and as a result, is working short periods throughout the day with significant breaks throughout. Counsel will also undergo 12 weeks of physical therapy, four days a week.

1 Secondly, as this Court is well aware, Social Security case filings in federal court
2 increased due to a combination of factors including an increase in appeals council decisions and
3 an increase in hearings at the administrative levels. Then, as a result of the pandemic, shelter-in-
4 place mandates, and Court ordered Stays, there were significant delays in producing transcripts.
5 In recent months, Counsel for the Plaintiff has received a greater-than-usual number of Answers
6 and Certified Administrative Records from defendant including over 56 cases in February and
7 March of 2022.

8 For the weeks of May 2, 2022 and May 9, 2022, Counsel for Plaintiff has 20 merit briefs,
9 and several letter briefs and reply briefs. For the remainder of the month of May 2022, Counsel
10 has over 21 merit briefs currently calendared, with that number expected to grow.

11 Counsel for the Plaintiff does not intend to further delay this matter. Defendant does not
12 oppose the requested extension. Counsel apologizes to the Defendant and Court for any
13 inconvenience this may cause.

14
15 Respectfully submitted,

16 Dated: April 28, 2022 PENA & BROMBERG, ATTORNEYS AT LAW

17
18 By: /s/ Jonathan Omar Pena
19 JONATHAN OMAR PENA
20 Attorneys for Plaintiff

21 Dated: April 28, 2022 PHILLIP A. TALBERT
22 United States Attorney
23 PETER K. THOMPSON
24 Acting Regional Chief Counsel, Region IX
25 Social Security Administration

26 By: */s/ Patrick Snyder
27 Patrick Snyder
28 Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on April 28, 2022)

ORDER

Based on the above stipulation (ECF No. 14), IT IS ORDERED that Plaintiff shall file Plaintiff's opening brief no later than August 1, 2022. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: May 12, 2022

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE